

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

Sylvia Jones,  
individually and on behalf of all others similarly situated,  
Plaintiff(s)

Civil Action No: 2:20-cv-879

-v.-

Mountain Run Solutions, LLC,  
and John Does 1-25.

Defendant(s).

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**  
**AGAINST MOUNTAIN RUN SOLUTIONS, LLC**

Plaintiff, Sylvia Jones, by and through her attorneys, Stein Saks, PLLC, moves for a Default Judgment against Mountain Run Solutions, LLC, in default for its failure to timely appear and Answer the Complaint. In support thereof, Plaintiff states as follows:

1. The Complaint in this action was filed on October 28, 2020. ECF Doc. 1.
2. On December 3, 2020, Defendant Mountain Run Solutions, LLC ("Defendant") was served with the Summons and Complaint. Doc. 8.
3. Defendant failed to timely appear and answer the complaint.
4. To date no appearance, answer or other responsive pleading has been filed.
5. Pursuant to Fed. R. Civ. P. 55(a) a Clerk's Default was entered on July 13, 2021 against Defendant.
6. Plaintiff's counsel has attached an affidavit of amounts due to respectfully ask that the Court enter judgment in this amount.
7. Although this case was filed as a putative class action, no class was ever certified.
8. Plaintiff is making this motion on behalf of herself only and upon entry asks that, to the extent necessary, the putative class members be dismissed without prejudice.

WHEREFORE, Plaintiff, Christina Reynolds, moves to grant his Motion for Default Judgment against Defendant, Mountain Run Solutions, LLC.

Dated: September 2, 2021

Respectfully submitted,

Stein Saks, PLLC

s/ Raphael Deutsch

Raphael Deutsch, Esq.

Stein Saks, PLLC

One University Plaza, Suite 620

Hackensack, NJ, 07601

(201) 282-6500

*Attorneys for Plaintiff appearing Pro Hac  
Vice*

**CERTIFICATE OF SERVICE**

Under penalties of perjury the undersigned states that on September 2, 2021, the following documents:

- 1) Motion for Default Judgment,
- 2) Memorandum in Support of Entry of Default Judgment,
- 3) Affidavit of Amount Due, and
- 4) Proposed Order

Were served on all interested parties in this action by placing a true and correct copy thereof in a sealed envelope, via certified mail, and deposited said envelope in the United States mail.

Mountain Run Solutions, LLC  
313 E. 1200 S, Suite 102  
Orem, UT 84058

Stein Saks, PLLC

s/ Raphael Deutsch  
Raphael Deutsch, Esq.  
Stein Saks, PLLC  
One University Plaza, Suite 620  
Hackensack, NJ, 07601  
(201) 282-6500

*Attorneys for Plaintiff appearing Pro Hac  
Vice*